

Exhibit H

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August 24, 2017

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VIA U.S. MAIL AND E-MAIL TO: cseeger@seegerweiss.com, and tbenedetto@seegerweiss.com

Re: *August 10, 2017 Discovery Requests to Cambridge Capital Group, LLC, and Timothy Howard, Gail Milon and Jeff Kahn*

Dear Mr. Seeger:

This law office represents Cambridge Capital Group, LLC, in response to the discovery requests referenced above, please be advised that Cambridge Capital Group, LLC, a Florida company was sold many months ago, and was officially dissolved in early May of 2017. *See* State of Florida Corporate Dissolution document attached in addition to this firm response to your discovery requests.

Cambridge is not a party to the *In re National Football League Players' Concussion Injury Litigation*, No. 2:12-md-02323-AB (E.D. Pa), litigation; consequently, Cambridge asserts that the discovery requests do not comply with Federal Rule of Civil Procedure 45, which governs the discovery of information from non-parties such as Cambridge, including requiring a valid subpoena in accordance with Rule 45(a)-(c). The request also seeks information that is not relevant to any party's claim or defense in the litigation. Thus, it is outside the scope of discovery under Federal Rule of Civil Procedure 26(b)(1). Moreover, to the extent that the request is overbroad and unduly burdensome and seeks information that the burden and expense will far outweigh the likely benefit, the request is also inappropriate.

The Florida Division of Corporations can also confirm that the corporate entity that you are requesting discovery from, Cambridge Capital Group LLC, no longer exist and was dissolved pursuant to a confidential sale and dissolution agreement entered into early this year.

The company was sold to Mr. Addys Walker, and he is the corporate representative and is the individual that discovery demands should be directed towards. Please note that neither Mr. Howard nor Ms. Milon or Jeff Kahn were owners or partners in Cambridge Capital Group LLC. Since neither Mr. Howard nor Ms. Milon or Jeff Kahn are permitted to respond to any discovery requests pursuant to the confidential sale and dissolution agreement, please redirect your legally appropriate discovery requests to Mr. Addys Walker via this law firm and we will promptly address the issues on his behalf and on behalf of Cambridge Capital Group LLC.

Thank you for your consideration and your efforts on behalf of Retired NFL Players.

Sincerely,



Martin L. Black, Attorney

State of Florida

Department of State

I certify from the records of this office that CAMBRIDGE CAPITAL GROUP LLC was a limited liability company organized under the laws of the State of Florida, filed on December 4, 2015, effective January 1, 2016.

The document number of this limited liability company is L15000203070.

I further certify that said limited liability company was voluntarily dissolved on May 2, 2017, effective May 3, 2017.

Given under my hand and the Great Seal of Florida, at Tallahassee, the Capital, this the Fifth day of May, 2017



Ken Detmer

Secretary of State

Authentication ID: 800298768208-050517-L15000203070

To authenticate this certificate, visit the following site, enter this ID, and then follow the instructions displayed.

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Attorney for Non-Parties:
CAMBRIDGE CAPITAL GROUP, LLC.,
GAIL MILON, TIMOTHY HOWARD, J.D., PHD.,
AND JEFF KAHN

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE
PLAYERS' CONCUSSION NJURY
LITIGATION

No. 2: 12-md-02323-AB

MDL No. 2323

Honorable Anita B. Brody

**RESPONSE OF NON-PARTIES:
CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D.,
P.H.D., AND JEFF KAHN TO REQUESTS FOR PRODUCTION OF
DOCUMENTS AND INTERROGATORIES**

Non-Parties, CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN hereby responds and object to the Requests for Production of Documents and Interrogatories (collectively, "Discovery Requests") served by Co-Lead Class Counsel as follows:

GENERAL OBJECTIONS TO DISCOVERY REQUESTS

1. CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN, object to the Discovery Requests in their entirety because they do not comply with Federal Rule of Civil Procedure 45, which governs the discovery of information from non-parties such as CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN, in particular, the Discovery Requests were not made pursuant to a valid subpoena in accordance with Rule 45(a)-(c).

2. CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN object to the Interrogatories in their entirety on the grounds that the Federal Rules of Civil Procedure do not authorize propounding interrogatories on non-parties such as CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN

3. CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN object to the Discovery Requests in their entirety because they seek the production of information relating to contracts that are not "relevant to any party's claim or defense" in the above-referenced lawsuit, Fed. R. Civ. P. 26(b)(1), and thus are outside the scope of discovery.

4. CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN object to the Discovery Requests in their entirety on the grounds that any dispute regarding contacts involving CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN, entered with any class members in the above-referenced lawsuit must be submitted to arbitration and may not be adjudicated by this Court.

5. CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN object to each Discovery Request to the extent that it purports to seek information protected by the attorney-client privilege and/ or the work product doctrine.

6. CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN object to each Discovery Request to the extent that it seeks information that is or may be confidential or information otherwise protected by any right of privacy.

7. CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN object to each Discovery Request to the extent that it seeks proprietary business information, trade secrets, or other confidential information.

RESPONSES TO REQUESTS FOR PRODUCTION

Notwithstanding and without waiving any of its General Objections, which are incorporated into each of its Responses as though set forth in full CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN respond to the

Requests for Production as follows:

REQUEST FOR PRODUCTION NO. 1:

Produce exemplars of all Solicitations that You directed toward Retired NFL Football Players.

RESPONSE TO REQUEST FOR PRODUCTION NO. 1:

CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN object to this Request on the grounds that (1) it does not comply with Federal Rules of Civil Procedure 45, which governs non-party discovery; (2) it seeks information that is not relevant to any party's claim or defense in this litigation, and thus it outside the scope of discovery under Federal Rule of Civil Procedure 26(b)(1); and (3) the burden and expense on non-parties, CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN, to respond to this Request far outweigh the likely benefit. Fed. R. Civ. Proc. 26(b)(1). CAMBRIDGE CAPITAL GROUP,

LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN further object to the defined term "Solicitations" as vague and ambiguous.

Based upon these objections, CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN decline to provide documents in response to this request.

REQUEST FOR PRODUCTION NO. 2:

Produce all Communications that You had with Retired NFL Football Players related to the Settlement.

RESPONSE TO REQUEST FOR PRODUCTION NO. 2:

CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN object to this Request on the grounds that (1) it does not comply with Federal Rules of Civil Procedure 45, which governs non-party discovery; (2) it seeks information that is not relevant to any party's claim or defense in this litigation, and thus it is outside the scope of discovery under Federal Rule of Civil Procedure 26(b)(1); and (3) the burden and expense on non-parties CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN to respond to this Request far outweigh the likely benefit. Fed. R. Civ. Proc. 26(b)(1). CAMBRIDGE CAPITAL GROUP, LLC objects to this request to the extent that it seeks information that is or may be confidential or information otherwise protected by any right of privacy and attorney/client privilege. Based upon these objections CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN decline to provide documents in response to this request.

REQUEST FOR PRODUCTION NO. 3:

Produce all Communications that You had with any other person or entity related to the Settlement, including, but not limited to MAF or BAP examinations, other Medical

services, or related in any way to MAF Monetary Awards. This also includes Communications with hedge funds related to providing funding and/or any services in conjunction with the Settlement.

RESPONSE TO REQUEST FOR PRODUCTION NO. 3:

CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN object to this request on the grounds that (1) it does not comply with Federal Rules of Civil Procedure 45, which governs non-party discovery; and (2) it seeks information that is not relevant to any party's claim or defense in this litigation, and thus it is outside the scope of discovery under Federal Rule of Civil Procedure 26(b)(1).

CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN further object to this request as overbroad and unduly burdensome to the extent it seeks Communications related in any way to the Class Action Settlement.

CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN object to this request to the extent that it seeks information that is or may be confidential or information otherwise protected by right of privacy. CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN further object to this request because it seeks information protected by the attorney-client privilege and/or the work product doctrine. Based upon these objections, CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN decline to provide documents in response to this request.

REQUEST FOR PRODUCTION NO. 4:

Produce all agreements that You entered into with any other person or entity related to the Settlement.

RESPONSE TO REQUEST FOR PRODUCTION NO. 4:

CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN object to this request on the grounds that (1) it does not comply with Federal Rules of Civil Procedure 45, which governs non-party discovery; (2) it seeks

information that is not relevant to any party's claim or defense in this litigation, and thus is outside the scope of discovery under Federal Rule of Civil Procedure 26(b)(1); and (3) the burden and expense on non-parties CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN to respond to this request far outweigh the likely benefit. Fed. R. Civ. Proc. 26(b)(1). CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN further object to the phrase "any other person or entity" as vague and ambiguous. CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN further object to this request as overbroad and unduly burdensome to the extent it seeks agreements related in any way to the Class Action Settlement. CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN further object to this request because it seeks information protected by the attorney-client privilege, based upon these objections, CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN decline to provide documents in response to this request.

REQUEST FOR PRODUCTION NO. 5:

Produce all agreements that You entered into with any Retired NFL Football Player.

RESPONSE TO REQUEST FOR PRODUCTION NO. 5:

CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN object to this request on the grounds that (1) it does not comply with Federal Rules of Civil Procedure 45, which governs non-party discovery; and (2) it seeks information that is not relevant to any party's claim or defense in this litigation, and thus is outside the scope of discovery under Federal Rule of Civil Procedure 26(b)(1). Based upon these objections, CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN decline to provide documents in response to this request.

REQUEST FOR PRODUCTION NO. 6:

Produce all agreements that You entered into related to any MAF Monetary Awards that might be made through the Settlement.

RESPONSE TO REQUEST FOR PRODUCTION NO. 6:

CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN object to this request on the grounds that (1) it does not comply with Federal Rules of Civil Procedure 45, which governs non-party discovery; and (2) it seeks information that is not relevant to any party's claim or defense in this litigation, and thus it outside the scope of discovery under Federal Rule of Civil Procedure 26(b)(1). Based upon these objections, CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN decline to provide documents in response to this request.

REQUEST FOR PRODUCTION NO. 7:

Produce all agreements that You entered into related to any other benefit that may be provided through the Settlement, including through the BAP or any comparable Medical services.

RESPONSE TO REQUEST FOR PRODUCTION NO. 7:

CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN object to this request on the grounds that (1) it does not comply with Federal Rules of Civil Procedure 45, which governs non-party discovery; and (2) it seeks information that is not relevant to any party's claim or defense in this litigation, and thus it outside the scope of discovery under Federal Rule of Civil Procedure 26(b)(1). Based upon these objections, CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN decline to provide documents in response to this request.

REQUEST FOR PRODUCTION NO. 8:

Produce any recordings of conversations related to the Settlement that You had with any person or entity.

RESPONSE TO REQUEST FOR PRODUCTION NO. 8:

CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN object to this request on the grounds that (1) it does not comply with Federal Rules of Civil Procedure 45, which governs non-party discovery; (2) it seeks information that is not relevant to any party's claim or defense in this litigation, and thus it is outside the scope of discovery under Federal Rule of Civil Procedure 26(b)(1); and (3) the burden and expense on non-parties CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN to respond to this request far outweigh the likely benefit. Fed. R. Civ. Proc. 26(b)(1). CAMBRIDGE CAPITAL GROUP, LLC GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN further objects to this request as overbroad and unduly burdensome to the extent it seeks recordings related in any way to the Class Action Settlement. CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN object to this request to the extent that it seeks information that is or may be confidential or information otherwise protected by right of privacy. CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN further object to this request because it seeks information protected by the attorney-client privilege. Based upon these objections, CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN decline to provide documents in response to this request.

RESPONSES TO INTERROGATORIES

Notwithstanding and without waiving any of its General Objections, which are incorporated into each of its Responses as though set forth in full, CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN respond to the Interrogatories as follows:

INTERROGATORY NO. 1:

Identify every Retired NFL Football Player with whom You have entered into any agreement related to the Settlement and state the nature of each agreement into which You entered with each Retired NFL Football Player.

RESPONSE TO INTERROGATORY NO. 1:

CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN object to this Interrogatory on the grounds that (1) Federal Rules of Civil Procedure 45, which governs non-party discovery, does not authorize the service of interrogatories on non-parties; (2) even if interrogatories were permitted, they were not served pursuant to a valid subpoena under Federal Rule of Civil Procedure 45; and (3) it seeks information that is not relevant to any party's claim or defense in this litigation, and thus it is outside the scope of discovery under Federal Rule of Civil Procedure 26(b)(1). Based upon these objections, CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN decline to provide written information or documents in response to this Interrogatory.

INTERROGATORY NO. 2:

Identify every Retired NFL Football Player referred for, sent to, or scheduled for any type of medical services, by You, anyone working on Your behalf, or working in conjunction with You in any way, regardless of whether the medical services were performed by someone affiliated with You or Your organizations or not.

RESPONSE TO INTERROGATORY NO. 2:

CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN object to this Interrogatory on the ground that (1) Federal Rules of Civil Procedure 45, which governs non-party discovery, does not authorize the service of interrogatories on non-parties; (2) even if interrogatories were permitted, they were not served pursuant to a valid subpoena under Federal Rule of Civil Procedure 45; and (3) it seeks

information that is not relevant to any party's claim or defense in this litigation, and thus it outside the scope of discovery under Federal Rule of Civil Procedure 26(b)(1). CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN further object to this Interrogatory as compound and unintelligible. Based upon these objections, CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN decline to provide written information or documents in response to this Interrogatory.

INTERROGATORY NO. 3:

Identify every Retired NFL Football Player for whom You, or anyone working on Your behalf, or working in conjunction with You in any way, have been involved in the payment, directly or through others, for a Retired NFL Football Player's expenses (whether on a nonrecourse or recourse basis) in connection with obtaining any Medical services to assist the Retired NFL Football Player in any way in participating in the Settlement.

RESPONSE TO INTERROGATORY NO. 3:

CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN object to this Interrogatory on the grounds that (1) Federal Rules of Civil Procedure 45, which governs non-party discovery, does not authorize the service of interrogatories on non-parties; (2) even if interrogatories were permitted, they were not served pursuant to a valid subpoena under Federal Rule of Civil Procedure 45; and (3) it seeks information that is not relevant to any party's claim or defense in this litigation, and thus it outside the scope of discovery under Federal Rule of Civil Procedure 26(b)(1). CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN further object to this Interrogatory as compound and unintelligible. Based upon these objections, CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD,

J.D., P.H.D., AND JEFF KAHN decline to provide written information or documents in response to this Interrogatory.

INTERROGATORY NO. 4:

Identify every individual and entity with whom You, anyone working on Your behalf, or working in conjunction with You in any way, have worked or Communicated in connection with any Retired NFL Football Player's obtaining any Medical services to assist the Retired NFL Football Player in any way in participating in the Settlement, including, but not limited to, medical providers. For each such individual and/or entity, explain the details of the relationship and identify each Retired NFL Football Player involved.

RESPONSE TO INTERROGATORY 4:

CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN object to this Interrogatory on the grounds that (1) Federal Rules of Civil Procedure 45, which governs non-party discovery, does not authorize the service of interrogatories on non-parties; (2) even if interrogatories were permitted, they were not served pursuant to a valid subpoena under Federal Rule of Civil Procedure 45; and (3) it seeks information that is not relevant to any party's claim or defense in this litigation, and thus it is outside the scope of discovery under Federal Rule of Civil Procedure 26(b)(1). CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN further object to this Interrogatory as compound and unintelligible. CAMBRIDGE CAPITAL GROUP, LLC GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN further object to this Interrogatory as overbroad and unduly burdensome. Based upon these objections, CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN decline to provide written information or documents in response to this Interrogatory.

INTERROGATORY NO. 5:

Identify every individual and entity with whom You, anyone working on Your behalf, or working in conjunction with You in any way, have any financial relationship or understanding, whether recourse or non-recourse, whether in writing or verbal, related to any Retired NFL Football Player's participation in the Settlement. For each such individual and entity, explain the details of the relationship and identify each Retired NFL Football Player involved. Identify any document related to the relationship.

RESPONSE TO INTERROGATORY NO. 5:

CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN object to this Interrogatory on the grounds that (1) Federal Rules of Civil Procedure 45, which governs non-party discovery, does not authorize the service of interrogatories on non-parties; (2) even if interrogatories were permitted, they were not served pursuant to a valid subpoena under Federal Rule of Civil Procedure 45; and (3) it seeks information that is not relevant to any party's claim or defense in this litigation, and thus is outside the scope of discovery under Federal Rule of Civil Procedure 26(b)(1). CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN further object to this Interrogatory as compound and unintelligible. CAMBRIDGE CAPITAL GROUP, LLC further objects to this Interrogatory as overbroad and unduly burdensome. Based upon these objections, CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN decline to provide written information or documents in response to this Interrogatory.

INTERROGATORY NO. 6:

Identify every individual and entity from whom You have obtained contact information for any Retired NFL Football Player, including their home or cellular telephone numbers, home or business addresses and email addresses.

RESPONSE TO INTERROGATORY NO. 6:

CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN object to this Interrogatory on the grounds that (1) Federal Rules of Civil Procedure 45, which governs non-party discovery, does not authorize the service of interrogatories on non-parties; (2) even if interrogatories were permitted, they were not served pursuant to a valid subpoena under Federal Rule of Civil Procedure 45; and (3) it seeks information that is not relevant to any party's claim or defense in this litigation, and thus it is outside the scope of discovery under Federal Rule of Civil Procedure 26(b)(1). CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN further object to this Interrogatory as compound and unintelligible. CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN further object to this Interrogatory as overbroad and unduly burdensome. CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN further object to this Interrogatory to the extent it seeks private or confidential information of former NFL players.

Based upon these objections, CAMBRIDGE CAPITAL GROUP, LLC, GAIL MILON, TIMOTHY HOWARD, J.D., P.H.D., AND JEFF KAHN decline to provide written information or documents in response to this Interrogatory.

Respectfully Submitted,

August 25, 2017

MARTIN L. BLACK, ATTORNEY, LLC



MARTIN L. BLACK
Attorney for Non-Parties
Cambridge Capital Group, LLC,
Gail Milon, Timothy Howard, J.D. P.H. D.,
And Jeff Kahn

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing has been provided via U.S. Mail to Christopher A. Seeger, Seeger Weiss LLP, 77 Water Street, New York, NY, 10005, and by Electronic Mail to cseeger@seegerweiss.com, this 25day of August, 2017.



MARTIN L. BLACK